

# MEMO ENDORSED

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March 6, 2017

### VIA ECF, E-mail and Hand Delivery

Honorable Kimba M. Wood  
Senior United States District Judge  
for the Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. David Williams, Steven Brown, Gerald Seppala.  
Docket No. S3 16 Cr. 436 (KMW)

### Letter Application Seeking The Court's Permission For Defendant Steven Brown To Travel To The United Kingdom On Business The Royal Anthropological Institute Film Festival

Dear Judge Wood:

I write again as the attorney for defendant Steven J. Brown to seek the Court's permission for Mr. Brown to travel to England to attend The Royal Anthropological Institute Film Festival from approximately March 24 until April 2, 2017.

His purpose would be to engage in film prospect business transactions and set conditions and terms in face to face meetings with executives, producers and other representatives of the media represented.

I rely on the statements in my prior letters to the Court regarding this topic for the reasoning behind the importance of Mr. Brown's travel to major international film festivals.

Granted  
KMW

Honorable Kimba M. Wood

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March 6, 2017

The Royal Anthropological Institute Film Festival (“RAI-FF”) is a biennial event dedicated to the celebration of ethnographic, anthropological, and archaeological filmmaking around the world. The RAI-FF promotional web description states that the Festival has “served as a leading forum for exploring the multiple relationships between documentary film making, anthropology, visual culture and the advocacy of cultural diversity and intercultural dialogue through film.”

I have again communicated with Assistant United States Attorney Patrick Egan who on behalf of the government does maintain his continuing objection to my client’s international travel as he believes such presents a flight risk. Again he does not contemplate filing with the Court a separate letter opposing my request for this international travel. I have also communicated with Mr. Brown’s Pretrial Services Officer, Matthew Carter. Pretrial Services takes no position on international travel but does note again for both AUSA Egan and myself that Mr. Brown has always honored his commitments to Officer Carter and his Office.

Thank you again for your consideration of this and my prior international travel requests.

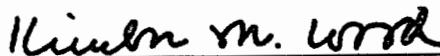
Respectfully submitted,



Walter Mack

cc: AUSA Patrick Egan (by ECF and email)  
PTSO Matthew Carter (by email)  
PTSO Natasha Ramesar (by email)

SO ORDERED:



KIMBA M. WOOD

U. S. D. J.

3/8/17